

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division**

Rochelle A. Manfra,

*Debtor.*

Case No. 24-10372-AMC  
Chapter 13  
Related to ECF No. 22

**Objection to Motion for Relief from the Automatic Stay**

Debtor Rochelle A. Manfra, through her attorney, objects to the Motion for Relief from the Automatic Stay filed by Movant Carrington Mortgage Services LLC.

1. The Debtor resides in the property and denies that it is vacant.
2. If the Court grants the Motion notwithstanding this objection, it must not grant relief further than modifying the automatic stay to permit the Movant to enforce its *in rem* rights under applicable nonbankruptcy law with respect to the property. *See* 11 U.S.C. § 362 (c)(1).

For those reasons, the Court must enter relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: June 9, 2024

CIBIK LAW, P.C.  
*Attorney for Debtor*

By: 

Mike Assad (#330937)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
help@cibiklaw.com

### Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: June 9, 2024



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Mike Assad